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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF CARI CAMPEN
LAUFENBERG IN SUPPORT OF MDL
PLAINTIFFS' ADMINISTRATIVE
MOTION PURSUANT TO CIVIL LOCAL
RULE 3-12 TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor

DECL. OF CARI CAMPEN
LAUFENBERG IN SUPP. OF MDL
PLS.' ADMIN. MOT. PURSUANT
TO CIV. L.R. 3-12 TO CONSIDER
WHETHER CASES SHOULD BE
RELATED

MDL No. 2843
CASE NO. 18-MD-02843-VC

I, Cari Campen Laufenberg, declare as follows:

1. I am a partner at Keller Rohrback L.L.P. I am a member in good standing of the State Bar of Washington and have been admitted to this Court *pro hac vice* for purposes of this action. I submit this Declaration in support of Plaintiffs' Administrative Motion Pursuant to Civil Local Rule 3-12 to Consider Whether Cases Should Be Related ("Administrative Motion"). I have personal knowledge of the matters set forth herein and could competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the complaint in *Kiss v. Flo Health, Inc. et. al*, No. 3:21-cv-04333-JD, which was filed in this District on June 7, 2021.

3. On August 3, 2021, I conferred via telephone and email with Carol Villegas and Michael Canty of Labaton Sucharow LLP, counsel for the *Kiss* plaintiff, informing them that, pursuant to Civil Local Rule 3-12, the factual allegations and legal claims asserted against Facebook in the *Kiss* matter are related to the factual allegations and legal claims asserted in the Second Amended Consolidated Complaint in *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, No. 3:18-md-02843 (the "MDL"), currently pending before this Court.

4. On August 10, 2021, counsel for the *Kiss* plaintiff stated that they would oppose the Administrative Motion and respond in due course.

5. I have conferred with Facebook's MDL counsel, Martie Kutscher Clark of Gibson, Dunn & Crutcher LLP, and have also contacted Facebook's counsel in the *Kiss* matter, Ashley Rogers, Lauren Blas, Cassandra Gaedt-Sheckter, and Christina Stella Cernak, also of Gibson, Dunn & Crutcher LLP, regarding whether the two actions should be related.

6. Facebook's MDL counsel has stated that Facebook does not believe that the *Kiss* matter should be related to the MDL. Facebook's counsel in the *Kiss* matter has not responded.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of August, 2021 at Seattle, Washington.

/s/ Cari Campen Laufenberg

Cari Campen Laufenberg